

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Policy and Rules Concerning the)
Interstate, Interexchange Marketplace)

CC Docket No. 96-61

Implementation of Section 254(g) of the)
Communications Act of 1934, as amended)

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REPLY COMMENTS
OF
THE TELECOMMUNICATIONS RESEARCH AND ACTION CENTER

Pursuant to the Notice of Proposed Rulemaking ("NPRM") released by the Federal Communications Commission ("Commission") on March 25, 1996 in the aforementioned proceeding, the Telecommunications Research and Action Center ("TRAC") submits these reply comments.

In these reply comments, TRAC reiterates the need for the public to have access to residential and business telephone rate information in order to make informed buying decisions and to foster competition in the marketplace. Detariffing, as proposed by the Commission, will severely limit consumer access to competitive pricing information. Comments¹ filed in this

¹ See e.g. Comments of Ohio Counsel, Pennsylvania PUC, Telecommunications Management Information Systems Coalition, WinStar, America's Carrier Telecom Association, Casual Calling Coalition, CompTel, Consumer Federation of America/Consumers Union, Market Dynamics, Fone Saver, General Communication, Inc. and General Service Administration.

proceeding support the need to ensure that consumers have access to reliable pricing information if the Commission adopts detariffing. We urge the Commission to take appropriate action to ensure that consumers have access to such information.

Each day, TRAC receives calls and requests from both residential and business telephone users who express their frustration with choosing a carrier. The average caller's frustration is caused by the number of conflicting messages in the marketplace and an increase in aggressive marketing practices by telecommunications carriers. Ten years after the breakup of AT&T, consumers continue to be living in a state of misinformation. One result is that a majority of consumers continue to stay on plans that charge standard rates, when they can easily save a significant amount of money by simply switching to a discount plan.²

With the passage of the Telecommunications Act of 1996, consumers may face even greater difficulty sorting through competing claims and marketing plans. There will be new entrants to the long distance market. Local service, including intraLATA toll calling, will also become competitive. This will lead to more confusion for the consumer and a greater need for credible, easy to understand information from sources like TRAC. TRAC saw this confusion grow with the entrance of hundreds of resellers and small telephone companies into the long distance market. We expect even more as the barriers to competition for local, intraLATA and long distance calling are removed.

² Consumer Long Distance: The Battle for Simplicity and Differentiation, The Yankee Group, May 1995.

TRAC believes it is in the public interest to ensure that rate information is available even if the Commission does away with tariffs. TRAC urges the Commission to create, as an alternative to tariffs, a simple rate form similar to the one suggested by the Telecommunications Management Information System Coalition.³ Telecommunications tariffs are cumbersome and difficult to read for both the consumer and the carrier. By creating a standard form or mechanism by which consumers can get pricing information via the Internet or through a central repository, the FCC would assist the millions of consumers that face the difficult chore of choosing a telecommunications provider.

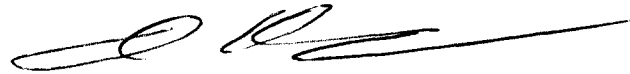
By standardizing this process, consumers, carriers, members of the press, and public interest organizations will all benefit. Since 1984, TRAC's Tele-Tips has provided an unbiased source of information on long distance for thousands of consumers. Other organizations, including Consumers Union⁴ and Consumer Action⁵, also provide information and tips on choosing a long distance carrier. This will continue only if the Commission takes the lead on ensuring that the public has access to this essential information. We urge the Commission to continue its role as information provider, so that the average consumer can continue to make informed buying decisions and to ensure fair competition in the telecommunications marketplace.

³ See e.g. Comments of Telecommunications Management Information Systems Coalition

⁴ See e.g. Consumer Reports, September 1995

⁵ See e.g. Consumer Action News, January/February 1996

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'S. Simon', with a long horizontal flourish extending to the right.

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May 24, 1996

CERTIFICATE OF SERVICE

I, Eleanor B. McVey, hereby certify that the foregoing
Comments of The Telecommunications Research and Action Center were
hand delivered to the following on the 24th of May, 1996:

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* Filing Submitted on Diskette and Hard Copy